

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>4E Brands Northamerica, LLC,<sup>1</sup></b>	§	<b>Case No. 22-50009</b>
	§	
<b>Debtor.</b>	§	

**STIPULATION EXTENDING U.S. TRUSTEE'S DEADLINE TO RESPOND TO MOTION**

(Related to ECF No. 715)

This Stipulation is made by and between (i) David Dunn, the Plan Agent and sole manager, sole director, sole office, and sole representative of 4E Brands Northamerica, LLC (“**Plan Agent**”) and (ii) the United States Trustee (the “**U.S. Trustee**”).

WHEREAS, on April 7, 2025, the Plan Agent filed a *Motion for Order Approving Compromise and Settlement Pursuant to Bankruptcy Rule 9019* (the “**Motion to Compromise**”). [ECF No. 715]. Based on the notice language in the Motion to Compromise, the current deadline to respond to the Motion to Compromise would be April 28, 2025.

WHEREAS on April 9, 2025, Chief Judge Alia Moses issued her Memorandum Opinion and Order at ECF No. 623 in Case No. 23-00645; *In re Professional Fee Matters Concerning the Jackson Walker Law Firm*.

WHEREAS, the U.S. Trustee asked, and the Plan Agent agreed, to extend any deadline by which the U.S. Trustee must respond to the Motion to Compromise.

Accordingly, the U.S. Trustee and the Plan Agent agree that the deadline to respond to the Motion to Compromise shall be no earlier than fourteen (14) days after the May 22, 2025, status conference, or as otherwise ordered by the District Court.

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<sup>1</sup> The Debtor in this Chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is 4E Brands Northamerica, LLC (0130). The Debtor’s principal place of business is 6 IH-10W, Suite 300, San Antonio, Texas 78257. The Debtor’s service address is: 41 W. Putnam Ave., STE 103, Greenwich, CT 06830.

**AGREED:**

OFFICE OF THE UNITED STATES  
TRUSTEE

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LLC*